



Travis K. Hopkins, PE
Director

City of Huntington Beach

2000 Main Street

PO Box 190

CA 92648

Department of Public Works
(714) 536-5431

February 13, 2009

Via email and U.S. Mail

California Regional Water Quality Control Board, Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348
Attn: Marc Brown

CRWQCB - REGION 8

CRWQCB - REGION 8	
MES	
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FEB 17 2009

Subject: Comment Letter - Tentative Order No. R8-2008-0030 NPDES No. CAS618030

Dear Mr. Brown:

The City of Huntington Beach has reviewed the *Renewal of Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County, Tentative Order No. R8-2008-0030, NPDES No. CAS618030, Areawide Urban Storm Water Runoff* and is in concurrence with the Orange County Public Works letter.

The City is offering the following comments for your consideration in addition to the Orange County's letter:

☐ **Page 40, Section X Municipal Inspections of Commercial Facilities**

The Tentative Order adds a new requirement for commercial facilities that priorities be established for inspection as a high, medium and low threat to water quality. Also, a minimum criterion must be met: 10% of commercial sites (not including restaurants/food markets) must be ranked "high"; 40% of commercial sites (not including restaurants/food markets) must be ranked "medium; and the remainder may be ranked "low". The high priorities are to be inspected at least once a year, all medium priorities are to be inspected at least every two years and all low priority sites are to be inspected at least once per permit cycle.

The City does not have the resources for the increase in the amount of inspections required annually which increases from approximately 70 commercial facilities to over 600 commercial facilities; this is an increase of over 800% for commercial inspections.

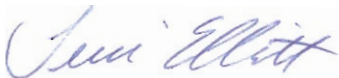
The City is in concurrence with the letter from Chris Crompton, Orange County Public Works letter in regards to the language modification as follows:

Each permittee shall conduct inspections of its commercial facilities as indicated below. To establish priorities for inspection, the permittees shall continue to prioritize commercial facilities/businesses within their jurisdiction as a high, medium or low threat to water quality based on such factors as the type, magnitude and location of the commercial activity, potential for discharge of pollutants to the MS4, any history of unauthorized, non-storm water discharges, proximity and sensitivity of receiving waters, material used and wastes generated at the site. Within 6 months of the adoption of this Order, the Permittees shall review their existing prioritization system, criteria, and results based on the inspections, and determine if any modifications are necessary. The modifications shall be completed within 6 months of the determination and reported on in the annual report.

- ☐ **Page 81, Attachment "C"** delete the following:
 - Fountain Valley Union High School District
 - Huntington Beach Elementary School District
 - Ocean View Union High School District
- ☐ **Page 81, Attachment "C"** add the following:
 - Fountain Valley School District
 - Huntington Beach City School District
 - Ocean View School District
- ☐ **Page 82, Attachment "C"**, add Huntington Beach Hospital

The City would like to thank you for your consideration of the above comments and if you have any questions, please contact me at 714-375-8494.

Sincerely,

A handwritten signature in blue ink that reads "Terri Elliott".

Terri Elliott, PE
Principal Civil Engineer

TE:cs